

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re BARCLAYS BANK PLC SECURITIES	: Master File No. 1:09-cv-01989-PAC
LITIGATION	:
_____	: <u>CLASS ACTION</u>
	:
This Document Relates To:	:
	:
ALL ACTIONS.	:
_____	X

**DECLARATION OF RICHARD A. RUSSO, JR. IN SUPPORT
OF LEAD PLAINTIFF'S MOTION FOR CLASS CERTIFICATION**

I, Richard A. Russo, Jr., hereby declare as follows:

1. I am an attorney duly licensed to practice in the Commonwealth of Pennsylvania and the State of New Jersey and have been admitted to practice *pro hac vice* before this Court for purposes of this action. I am a partner of the law firm Kessler Topaz Meltzer & Check, LLP, co-counsel of record for Lead Plaintiff in the above-entitled action. Unless otherwise indicated, I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from PX 14, (2007 20-F).

3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from PX 387 (2008 20-F).

4. Attached hereto as Exhibit 3 is a true and correct copy of PX 282 [**FILED UNDER SEAL**].

5. Attached hereto as Exhibit 4 is a true and correct copy of PX 102 [**FILED UNDER SEAL**].

6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the

Deposition of Joseph C. Kaczka, dated September 22, 2015 **[FILED UNDER SEAL]**.

7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the Deposition of Sean Teague, dated September 29, 2015 **[FILED UNDER SEAL]**.

8. Attached hereto as Exhibit 7 is a true and correct copy of PX 184 **[FILED UNDER SEAL]**.

9. Attached hereto as Exhibit 8 is a true and correct copy of PX 182 **[FILED UNDER SEAL]**.

10. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from the Deposition of John Kreitler, dated August 19, 2015 **[FILED UNDER SEAL]**.

11. Attached hereto as Exhibit 10 is a true and correct copy of PX 39 **[FILED UNDER SEAL]**.

12. Attached hereto as Exhibit 11 is a true and correct copy of PX 179 **[FILED UNDER SEAL]**.

13. Attached hereto as Exhibit 12 is a true and correct copy of PX 278 **[FILED UNDER SEAL]**.

14. Attached hereto as Exhibit 13 is a true and correct copy of PX 279 **[FILED UNDER SEAL]**.

15. Attached hereto as Exhibit 14 is a true and correct copy of PX 207 **[FILED UNDER SEAL]**.

16. Attached hereto as Exhibit 15 is a true and correct copy of PX 209 **[FILED UNDER SEAL]**.

17. Attached hereto as Exhibit 16 is a true and correct copy of PX 295 **[FILED UNDER SEAL]**.

18. Attached hereto as Exhibit 17 is a true and correct copy of PX 82 **[FILED UNDER SEAL]**.

19. Attached hereto as Exhibit 18 is a true and correct copy of PX 23 **[FILED UNDER SEAL]**.

20. Attached hereto as Exhibit 19 is a true and correct copy of PX 111 **[FILED UNDER SEAL]**.

21. Attached hereto as Exhibit 20 is a true and correct copy of BARC-ADS-01283532 **[FILED UNDER SEAL]**.

22. Attached hereto as Exhibit 21 is a true and correct copy of PX 356 **[FILED UNDER SEAL]**.

23. Attached hereto as Exhibit 22 is a true and correct copy of BARC-ADS-01374873-75 **[FILED UNDER SEAL]**.

24. Attached hereto as Exhibit 23 is a true and correct copy of PX 352-A **[FILED UNDER SEAL]**.

25. Attached hereto as Exhibit 24 is a true and correct copy of PX 465 **[FILED UNDER SEAL]**.

26. Attached hereto as Exhibit 25 is a true and correct copy of PX 482 **[FILED UNDER SEAL]**.

27. Attached hereto as Exhibit 26 is a true and correct copy of PX 395 **[FILED UNDER SEAL]**.

28. Attached hereto as Exhibit 27 is a true and correct copy of BARC-ADS-01535031 **[FILED UNDER SEAL]**.

29. Attached hereto as Exhibit 28 is a true and correct copy of PX 485 **[FILED**

UNDER SEAL].

30. Attached hereto as Exhibit 29 is a true and correct copy of PX 487 **[FILED UNDER SEAL].**

31. Attached hereto as Exhibit 30 is a true and correct copy of UW_Barclays_000011398 **[FILED UNDER SEAL].**

32. Attached hereto as Exhibit 31 is a true and correct copy of excerpts from the Deposition of Dennis Askelson, dated September 15, 2015. **[FILED UNDER SEAL].**

33. Attached hereto as Exhibit 32 is a true and correct copy of the Firm Resume of Kessler Topaz Meltzer & Check, LLP.

34. Attached hereto as Exhibit 33 is a true and correct copy of the Firm Resume of Robbins Geller Rudman & Dowd LLP.

I declare that the foregoing is true and correct, to the best of my knowledge.

Dated: December 9, 2015

/s/ Richard A. Russo, Jr.
Richard A. Russo, Jr.